



THE COMMONWEALTH OF MASSACHUSETTS  
OFFICE OF CONSUMER AFFAIRS AND BUSINESS REGULATION

**DEPARTMENT OF  
TELECOMMUNICATIONS & ENERGY**

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Judy Y. Lee, Esq.  
Massachusetts Electric Company  
25 Research Drive  
Westborough, MA 01582

BY FAX AND U.S. MAIL

RE: Petition of Towns of Franklin and Swampscott, D.T.E. 03-98

December 10, 2003

Dear Sirs:

Enclosed please find the Department of Telecommunication and Energy's first set of information requests on the above-captioned matter. Responses should be filed on or before December 23, 2003. If you have any questions, please feel free to contact me at (617) 305-3620.

Sincerely,

/s/

William H. Stevens, Jr.  
Hearing Officer

Staff as assigned  
Service list  
Encl.

**COMMONWEALTH OF MASSACHUSETTS  
DEPARTMENT OF TELECOMMUNICATIONS AND ENERGY**

FIRST SET OF INFORMATION REQUESTS OF  
THE DEPARTMENT OF TELECOMMUNICATIONS AND ENERGY TO  
MASSACHUSETTS ELECTRIC COMPANY, D.T.E. 03-98

Pursuant to G.L.c.164, ' 34A, the Department of Telecommunications and Energy ("Department") hereby submits to Boston Edison the following information requests with respect to the above captioned matter.

**Instructions**

The following instructions apply to this set of information requests and all subsequent information requests issued by the Department to Boston Edison Company in this proceeding.

1. "Company" or "MECo" means Massachusetts Electric Company and Nantucket Electric Company, its officers, directors, employees, consultants, and attorneys.
2. "Towns" means the towns of Franklin and Swampscott
3. "Petition" means the petition for dispute resolution filed by the Towns of Franklin and Swampscott, pursuant to G.L. c. 164, § 34A, to resolve a dispute between the Towns and Massachusetts Electric Company and Nantucket Electric Company, filed on October 17, 20003.
4. "MECo Response" means the November 10, 2003 Answer of Massachusetts Electric Company, pursuant to 220 C.M.R. § 1.04(2), to the Petition for dispute resolution by the Towns.
5. Each request should be answered in writing on a separate page with a recitation of the request, and with a reference to the request number, the docket number of the case, and the name of the person responsible for the answer. Please submit all responses on three-hole punched paper.
6. Please do not wait for all answers to be completed before supplying answers, but instead please provide the answers as they are completed.
7. These requests shall be deemed continuing so as to require further supplemental responses if the Company or its witnesses receives or generates additional information within the scope of these requests between the time of the original response and the close of the record in this proceeding.
8. The phrase "provide complete and detailed documentation" means provide all data, assumptions, and calculations on which the response relies; provide the source of and basis for all data and assumptions employed; include all studies, reports, and planning documents from which data, estimates, or assumptions were drawn and support for how

the data or assumptions were used in developing the projections or estimates; and provide and explain all supporting workpapers.

9. The term "document" is used in its broadest sense and includes, without limitation, writings, drawings, graphs, charts, photographs, phono-records, microfilm, microfiche, computer printouts, correspondence, handwritten notes, records or reports, bills, checks, articles from journals or other sources, and other data compilations from which information can be obtained, and all copies of such documents that bear notations or other markings that differentiate such copies from the original.
10. If the Company finds that any of these requests is ambiguous, please notify the hearing officer so that the requests can be clarified prior to the preparation of a written response.
11. Please serve a copy of the responses on Mary Cottrell, Secretary of the Department. Please also submit the responses directly to: (1) William Stevens, Legal Division; (2) Jody Stiefel, Legal Division; (3) James Byrnes, Rates and Revenues Requirements Division; (4) Joseph Passaggio, Rates and Revenues Requirements Division; and (5) Sean Hanley, Rates and Revenues Requirements Division. In addition to filing, please submit responses by e-mail to [dte.efiling@state.ma.us](mailto:dte.efiling@state.ma.us) and to [william.stevens@state.ma.us](mailto:william.stevens@state.ma.us).

**COMMONWEALTH OF MASSACHUSETTS  
DEPARTMENT OF TELECOMMUNICATIONS AND ENERGY**

FIRST SET OF INFORMATION REQUESTS OF  
THE DEPARTMENT OF TELECOMMUNICATIONS AND ENERGY TO  
MASSACHUSETTS ELECTRIC COMPANY, D.T.E. 03-98

Pursuant to G.L.c.164, ' 34A, the Department of Telecommunications and Energy("Department") hereby submits to Massachusetts Electric Company the following information requests with respect to the above captioned matter.

- DTE 1-1      Provide the exact calculations and analysis that produced the Company's proposed prices for the Town's streetlights in a concise and easy to interpret manner including:
- a.)      All values used in the calculations
  - b.)      Definitions of all values
  - c.)      Origins of all values
  - d.)      All work papers related to said values and calculations
- DTE 1-2      Refer to the MECO Answer at 14, ¶ 40. Provide evidence in regards to the statement that the Company is "working to ascertain the level" of new streetlights installed in "new developments on private streets that have not been accepted" by Franklin or Swamscott. Include with this response an explanation of any methods the Company and/or Towns have suggested or are considering, and any work papers and calculations regarding this issue. Also, include any correspondence between the Company and the Towns in regards to this issue.
- DTE 1-3      Explain the difference between the Company's calculations of unamortized streetlight investment proposed in DTE 98-69, DTE 98-89 and DTE 01-25, and how this difference resulted in the different values that the Company has presented to the Towns representing a proposed streetlight purchase price.
- DTE 1-4      Provide the specific depreciation rates the Company used to calculate the unamortized streetlight investment amount. Indicate the Department proceeding in which these depreciation rates were approved.
- DTE 1-5      Describe how the Company has accounted for early streetlight retirements in the past, as well as the present. Provide complete and detailed documentation to support your response.
- DTE 1-6      Who is responsible for the costs associated with streetlights in new developments on private streets that have not yet been accepted by the town in which such streetlights are located ?

- DTE 1-7      Provide a copy of the Company's policy regarding streetlights in new developments.
- DTE 1-8      Refer to the MECo Answer at 3. Provide more information explaining Mass. Electric's Asset Management System including, but not limited to, the following:
- a.)      When the asset management system was implemented.
  - b.)      Details this system provides to the Company concerning plant investments.
  - c.)      Whether its purpose is specific to streetlights or not.
  - d.)      How long this system has been in service.
  - e.)      What system was in place before the current system was implemented, and the major differences between the systems.
- DTE 1-9      Provide evidence explaining how MECo recorded streetlight data prior to 1964. What occurred in 1964 to change how streetlight data was recorded?
- DTE 1-10     In regards to how the Company handles streetlighting in new developments, are there any kind of developer contributions? If yes, then please provide the Department with an explanation of these contributions and all records regarding such contributions that took place in the towns of Franklin and Swampscott.